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UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

## DISABILITY RIGHTS WASHINGTON,

No. CV-09-024-JLO

Plaintiff,

VS.

DECLARATION OF JOSE  
ALARCON

PENRITH FARMS, JAMES BREWSTER  
and SHERRY BREWSTER, and STEVEN  
A. CARRERAS,

#### Defendants.

I, Jose Alarcon, M.D., declare as follows:

1. I am over the age of eighteen, have personal knowledge of the matters herein and am competent to testify thereto.

2. I am licensed to practice medicine in the state of New York.

3. I have been in the practice of psychiatric since 1972.

4. I am recognized as a diplomat by the American Board of Psychiatry and

Neurology.

1       5. I have provided psychiatric treatment to J [REDACTED] S [REDACTED] since June 26,  
2 2008, and continue to do so to this day.

3       6. My current diagnostic impression of Mr. S [REDACTED] is as follows. He  
4 suffers from a personality change due to brain trauma. He has been previously  
5 diagnosed with bipolar disorder, unspecified. Both of these diagnoses constitute  
6 major and persistent mental illnesses per the Diagnostic and Statistical Manual  
7 (DSM) IV Text Revision (TR).<sup>1</sup>

I declare under penalty of perjury pursuant to 28 U.S.C § 1746 that the foregoing is true and correct.

10 Dated this 3rd day of March, 2009 at Albany, New York.

Alarcon

<sup>20</sup> <sup>1</sup> AMERICAN PSYCHIATRIC ASSOCIATION, DIAGNOSTIC AND STATISTICAL MANUAL OF MENTAL DISORDERS: DSM-IV-TR. 392, 864 (AMERICAN PSYCHIATRIC ASSOCIATION) (2000).

1                   CERTIFICATE OF SERVICE

2                   I hereby certify that on the 6<sup>th</sup> day of March, 2009, I electronically filed the  
3 foregoing with the Clerk of the Court using the CM/ECF system which will send  
notification of such filing to the following: Matthew Sanger ([sanger@ssglaw.org](mailto:sanger@ssglaw.org)).

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5                   s/Mona Rennie  
6                   Legal Assistant  
7                   Disability Rights Washington  
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CERTIFICATE OF SERVICE

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